

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
KANSAS CITY DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	Case No. 4:13-cv-00449-BCW
)	
VITAS HOSPICE SERVICES, L.L.C., <i>et al.</i> ,)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF DEADLINE

(with supporting suggestions incorporated)

The parties, by and through their attorneys, hereby respectfully request that this Court enter an Order extending by 60 days the deadline to reopen this case. In support of these requests, the parties state as follows:

Pursuant to the Order of Dismissal, Dkt. 431, the parties have until March 19, 2018 to perfect the settlement in this case. Until that date, any party may move to reopen the case. As of today, the related Illinois state action, No. 14L2786, remains open pending execution of the settlement agreement between the Vitas Defendants and the State of Illinois. Because the state action will likely be dismissed in a matter of weeks, we move that the March 19 deadline to reopen this case be extended by 60 days to allow for the resolution of the state action.

WHEREFORE, the parties request the Court enter an order extending the deadline to reopen this case by 60 days.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of March, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, a true copy of the foregoing to be furnished via CM/ECF to all counsel of record.

/s/ Stacey M. Bowman

Stacey M. Bowman #60778